



Panhandle Pipe Line Companies

An International Energy Company

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Dockets Facility
U.S. Department of Transportation
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RE: **Docket No. RSPA-98-4957 - 30**
Revision of Natural Gas Transmission and Gathering Pipeline Incident and Annual Report Forms

Please find attached the comments submitted by Panhandle Eastern Pipeline Company and Trunkline Gas Company in response to RSPA's request for comments regarding the above referenced docket.

If you have any questions or require any additional information, please contact me at 713-989-7471 or Eric Amundsen at 713-989-7460.

Sincerely,

Jerry Rau
Manager, Pipeline Integrity

CC:
Eric Amundsen – Director of Technical Services
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Introduction

Panhandle Eastern Pipeline Company and Trunkline Gas Company; operate an extensive interstate natural gas transmission system. This pipeline system receives natural gas from the major production areas of the Midwest and Gulf Coast for transportation and sale in the Upper Midwest of the United States. The operation of this pipeline system is subject to the requirements of Title 49 Code of Federal Regulation Parts 190, 191, 192, 193, and 199.

Panhandle Eastern Pipeline Company and Trunkline Gas Company supports the efforts of the Research and Special Programs Administration (RSPA) to more effectively define Incidents and further define the causes of leaks on the Annual Report. We assume that the information regarding Pipe Vintage and Class Location are for informational purposes, since properly maintained and monitored pipe is safe no matter how old it is or where it is located. With the increased level of detail expected for the Incident Report, we suggest that the time allowed before the Incident Report is due be increased to 120 days to allow the Results from Laboratory Tests to be included in the Original Report. This should not be an issue with the OPS, since current Regulations now require Telephonic Notice of Incidents soon after they happen.

Instructions

Panhandle Eastern Pipeline Company and Trunkline Gas Company would have welcomed a chance to assist the OPS in developing the Instructions for both the proposed Incident Form and the Annual Report. We were disappointed that the Instructions were not included in the Notice. We think that OPS will agree that clear and concise instructions would enhance the responses that OPS receives on both Forms and would limit any misunderstanding as to the intent of any particular question.

Incident Report

"Part D-Material Specification" has not changed from the old Form. This section has always been confusing when the Incident did not involve pipe or a valve, since those seem to be the only two items that it pertains to. In addition, if an Incident involves a valve, then why is the wall thickness and SMYS of the pipe needed. A statement on the form indicating that the Operator should only fill in the portions of this section that are important to the Incident or a statement in the Instructions to that effect would enhance the effectiveness of the Form.

Under "Part F1-Corrosion", Subpart "d", the year that cathodic protection was started will not readily be available for older pipelines, which had cathodic protection added over a number of years. This pertains to Pipelines installed prior to the existence of 49 CFR192 when specific

protection criteria varied from Company to Company. The Instructions should recognize this fact and instruct the User of the Form that if the exact year is unknown, that a reasonable estimate of when the Operator believes that adequate cathodic protection was installed may be substituted in this space.

Annual Report

Panhandle Eastern Pipeline and Trunkline Gas Company feel that the requirement to provide a separate Annual Report by State is an unnecessary Administrative burden. The current Annual Report does not require this level of detail. In the case of the combined Panhandle Eastern Pipeline Companies this amounts to 15 reports for 13 separate states instead of the 2 that we are required to provide now. Modifications will have to be made to our Pipeline Database to handle the Query by State. We fail to see how this change improves Pipeline Safety, since the primary purpose of the Annual Report is to provide OPS with Pipeline Miles for the levying of User Fees.

"Decade of Installation" has little effect on the Integrity of Pipelines and Panhandle Eastern Pipeline and Trunkline Gas Company fail to see why this information is required. Pipe used in Natural Gas Service does not wear out, so age is not an issue. We feel that the condition of the pipe and how well it is maintained are bigger issues when discussing Pipeline Integrity.

"Class Location" is another nice to know item that again has very little to do with Pipeline Integrity. OPS already requires that the Natural Gas Industry provide increased levels of Safety in these Areas, although the same requirements are not imposed on the Hazardous Liquid Pipelines. How the OPS intends to gather the same information from the Hazardous Liquid Pipelines may become an issue since they do not gather this information, nor are they currently required to submit an Annual Report.

Conclusion

Panhandle Eastern Pipeline Company and Trunkline Gas Company understand why additional information is needed on the Incident Report to prevent erroneous interpretation of the data by other Government Agencies and to provide all users of the data with more a more detailed look at what causes Incidents. We have suggested minor changes to the proposed Incident Report that we feel will enhance its effectiveness.

Our main concerns regarding the changes to the Annual Report are the increased Administrative burden and that the inclusion of the information on "Decade of Pipe" and "Class Location" somehow indicate that these are critical issues in Pipeline Safety. We do not consider this to be the case, as we have made clear in our comments. We consider "Decade of Installation" and "Class Location" as nice to know type information that may provide OPS with additional

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information that they may use for other purposes other than Pipeline Safety. In addition, we wonder why the OPS chose to increase the level of detail required from the Natural Gas Operators, when they currently do not require any type of Annual Report from the Hazardous Liquid Pipeline Operators.